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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

JORGE CRUZ-RODRIGUEZ,

Defendant.

Case No.: 2:16-cr-00035-APG-VCF

REQUEST TO FILE LATE PLEADING
AND STIPULATION TO CONTINUE
TIME FOR RESPONSE TO MOTION TO
DISMISS

COMES NOW the United States of America, by and through DANIEL G. BOGDEN, United States Attorney, and Robert A. Bork, Assistant United States Attorney, and Rachel M. Korenblat, counsel for the Defendant JORGE CRUZ-RODRIGUEZ, and requests a 30 day continuance of the deadline for filing a Response to Defendant's Motion to Dismiss filed May 4, 2016. The response was due May 18, 2016 but the parties request as they have entered into negotiations to resolve the case which would lead to the withdrawal of the Motion to Dismiss that this stipulation be granted. The request is to extend the date for the Response to

1 June 20, 2016 to give time for the plea memorandum to be prepared and the District Court to
2 accept a guilty plea under that agreement. Trial is presently set for July 25, 2016 but the parties
3 believe the case will be resolved without the need for a trial.

4 DATED this 23rd day of May, 2016.

5 Respectfully submitted,

6 DANIEL G. BOGDEN
7 United States Attorney

8 */s/ Robert A. Bork*

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10 ROBERT A. BORK
11 Assistant United States Attorney

12 */s/ Rachel M. Korenblat*

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14 RACHEL M. KORENBLAT, AFD
15 Counsel for Defendant

16 Leave of Court is granted for the filing of the foregoing stipulation.

17 DATED this 23rd day of May, 2016.

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20 UNITED STATES DISTRICT JUDGE